NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF HAZARDOUS WASTE MANAGEMENT
HAZARDOUS WASTE INSPECTION REPORT

DWM-029

HAZARDOUS WASTE PERMIT FACILITY INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: Naval Weapons Station - Earle

FILE NUMBER: 13-09-01

VHT FACILITY FILE NUMBER: ~

PERMIT #: 1309A1HP01

REGION: C

INSPECTION DATE: 3/5/93 & 3/12/93

INCIDENT/CASE NUMBER: ~

INSPECTION TYPE: Genererator/TSD/LDR

RESPONSIBLE AGENCY CODE: NJDEPE

INSPECTOR'S NAME: Dale Adkisson

INSPECTOR'S AGENCY: NJDEPE

INSPECTOR'S BUREAU: CBW&HW

EPA ID NUMBER: NJ0170022172

ADDRESS: Route # 34
Colts Neck, NJ 07722

LOT: _____ BLOCK: _____

COUNTY: Monmouth

FACILITY PERSONNEL: Dennis Swalwell
Gus Hermanns

TELEPHONE #: 908-577-2339

OTHER STATE/EPA PERSONNEL: ~
~

REPORT PREPARED BY: Dale Adkisson

REVIEWED BY: _____

DATE OF REVIEW: _____

REVISION: 3

SITE SPECIFIC RCRA INSPECTION CHECKLIST FOR:

NAVAL WEAPONS STATION EARLE
ROUTE 34, COLTS NECK, NJ 07722
EPA ID #NJD170022172
PERMIT #1309A1HP01

1. Monitoring and Records - Condition 10 — Yes / No

a. Are records retained of all monitoring information, copies of all reports required by this permit for a period of at least three years from the date of the sample, measurement, report, inspection or application? [✓] [ ]

b. Does the permittee maintain the following information in the written Operating Record?

1. The individual who performed the sampling or measurements? [✓] [ ]
2. The date the analyses were performed? [✓] [ ]
3. The individual who performed the analysis? [✓] [ ]
4. The results from the tests for the parameters listed in the above table? [✓] [ ]
5. Copies of all manifests, arranged chronologically? [✓] [ ]

2. Authorized Storage Areas - Condition 2

a. Are only the following areas used to store hazardous wastes? [✓] [ ]

Area #	Location	Container Type	Capacity	Amount
1	Building QH-8	55-Gal. Containers	3,300 Gal.	< 3,300 gal
2	Near Demilitarization Furnace	55-Gal. Containers	12,100 Gal.	< 12,100 gal
3	Building C-14	Aboveground Tank	3,000 Gal.	< 3000 gal

b. Does the permittee store more than 15,100 gallons of hazardous waste (as specified in Condition 2(a) in drums or any DOT approved containers of 55-gallons or less at the facility? [ ] [✓]

c. Storage of Solid Waste

The permittee is authorized to store on-site generated compatible dry industrial waste (ID 27) for periods of less than six months in accordance with N.J.A.C. 7:26-1.1(a)5 in the areas authorized for storage of containerized hazardous waste by this permit. Solid waste shall be managed in conformance with the Monmouth County Solid Waste Management Plan and Intra District Solid Waste Rules.

Is all ID 27 material stored on-site for less than six months? [✓] [ ]

→ appears in Compliance. -

Yes No

d. Storage in Tank

Are only the following liquid wastes stored in the aboveground storage tank?

Waste Type	EPA ID Number	Process Description	
Waste Lube Oil	X726	Automotive Lubrication	
Waste Oil	X721	Automotive Crankcase Oil	[✓] [ ]

3. Permitted Waste Types - Condition 3

a. Are the only hazardous wastes stored as follows: [✓] [ ]

→ BASED ON MANIFEST Review & observation of descriptions on drum labels.

Storage in Container Waste Types	NJDEP Hazard Waste Number	Process Description
Stoddard Solvent, Petroleum Naphtha, Paint Waste, Waste Adhesive, Contaminated Gasoline	D001	Degreasing and Cleaning, Painting, Adhesives, Tank Draining
Potassium Hydroxide Sulfuric Acid, Carbon Batteries	D002	Torpedo Batteries, Battery Acid, Outdated Carbon Batteries
Otto Fuel (Liquid and Solid) and Other Approved Reactives Permitted to Be Treated at the EOD Range	D003	Torpedo Cleaning
Nickel Cadmium Batteries	D006	Outdated Batteries
Spent Abrasive	D007	Paint Removal
Spent Abrasive, Precipitation, Fly Ash	D008	Paint Removal, Bermed Storage Area
Mercuric Nitrate, Mercury Supernate	D009	Boiler Waste Test Solution, Dental Amalgam Storage
Scrap Silver Mercury, Scrap Silver	D011	Silver Battery Dismantling, Dental Amalgam, Silver Recovery Cartridges, Electrolytic Silver Recovery, Film
Trichloroethylene, Tetrachloroethylene, Methylene Chloride, Trichloroethane, Trichlorofluoromethane	F001	Degreasing and Cleaning

Storage in Container Waste Types	NJDEP Hazard Waste Number	Process Description
Xylene, Acetone, Methanol	F003	Degreasing and Cleaning
Toluene, Methyl Ethyl Ketone	F005	Degreasing and Cleaning
Methyl Ethyl Ketone	U159	Degreasing and Cleaning
Xylene	U239	Degreasing and Cleaning
Waste Lube Oil, Bilge Water, Spill Debris, Waste Oil, Transformer Oil	X721, X724, X725, X726	Automotive Lubrication, Ships Bilge, Spill Cleanup, Diesel Engine Lubrication, Electrical Equipment
PCB Oil	X750	Servicing of Electrical, Hydraulic or Other Equipment
Rags and Disposable Coveralls from Servicing PCB Equipment	X751	Servicing of Electrical, Hydraulic or Other Equipment
Drained Electrical, Hydraulic or Other Equipment Which at the Time of Draining Contained Liquids with 50 ppm or More PCB's by Dry Weight	X752	Servicing of Electrical, Hydraulic or Other Equipment
Undrained Electrical Hydraulic or Other Equipment Containing Liquids with 50 ppm or More of PCB's by Dry Weight	X753	Servicing of Electrical, Hydraulic or Other Equipment

b. List other waste codes found to be stored in a permitted storage areas.

Waste Type	Amounts
None apparent	

4. Treatment of Hazardous Waste - Condition 2 — Yes / No

a. Is treatment carried out in any other area of the facility other than the approved explosive ordinance demolition (EOD) range? [ ] [✓]

b. Is more than a maximum of 50 lbs. of waste explosives and highly reactive wastes per shot disposed of by open detonation at the EOD range? [ ] [✓]

c. Is more than a maximum of 100 lbs. of waste explosives and highly reactive wastes per shot disposed of by open burning in an unlined pit at the EOD range? [ ] [✓]

d(1). Are only the following D003 wastes treated at the EOD range? [✓] [ ]

Explosive D (Ammonium Picrate)
TNT (2,4,6-Trinitrotoluene)
RDX (Cyclotrimethhylenetrinitramine, Hexahydro, Trinitrotriazine)
C-4 (Plastic Explosive: 91% RDX, Plus Polyisobutylene, Motor Oil and Dibutyl-Sebacate)
Black Powder (74% Potassium Nitrate, 15.6% Charcoal, and 10.4% Sulfur)
Double-Base Propellant (More Than 90% Introcellulose and Nitroglycerine
Single-Base Propellant (Primarily Nitrocellulose)
Picric Acid (2,4,6-Trinitrophenol)

Some of the items containing the above, which in some cases are one-shot affairs, are non-serviceable 3"50, 76 mm, 5"48 rounds, "bangalore torpedoes" (used for general demolition work) and 2.75 inch rockets.

d(2). List other waste types found to have been treated at the EOD range (attach records available to substantiate this).

None apparent

e. Are all hazardous wastes treated at the EOD range destroyed completely? [✓] [ ]

5. Waste Analysis and Quality Control — Yes [✓] No [ ]

a. Does the facility perform analysis required by their waste analysis plan as follows? [✓]

WASTE STREAM ANALYTICAL REQUIREMENTS

WASTE	CONTAINER	SAMPLING FREQUENCE*	CHARACTERISTICS TO BE SAMPLED FOR**
Furnace Baghouse Ash	Drum	a, c	EP
Dry Paint Residue	Drum	a, c	EP
Abrasive Grit	Drum	c	EP
Spent Solvents	Drum	a, c	"F", EP, I, C, R
Boiler Water Test Solution	Drum	c	EP
Waste Oil	Aboveground Tank, Drum	a, c	PCB, EP, I, C, R
PCB	Drums Transformers Capacitors	b	Quantity of PCB
Asbestos	Bags	c	
Potassium Hydroxide	Drum	c	C
Amalgam	Drum	c	EP

*Sampling Frequency

a - Sample before disposal (random samples).
b - Sample before disposal (all containers).
c - No sampling required if characteristics are known.

**Characteristics

EP - EP Toxicity
I - Ignitability
C - Corrosivity
R - Reactivity
"F"- Waste defined by 40CFR 261

List any deviations below:

None apparent

b. Is the following information included in the monitoring records?

		Yes	No
1.	The date, exact place, and time of sampling or measurements;	[✓]	[ ]
2.	The individual(s) who performed the sampling or measurements;	[✓]	[ ]
3.	The date(s) analyses were performed;	[✓]	[ ]
4.	The individual(s) who performed the analysis;	[✓]	[ ]
5.	The analytical methods used;	[✓]	[ ]
6.	The results of each analysis.	[✓]	[ ]

6. Inspections - Condition 5

a. Are inspections of the drum storage areas being conducted at required frequencies and are records of same available at proper location as follows?

Activity/Equipment	Inspected For	Frequency	
Container Labeling and Identification	Completeness	Daily	[✓] [ ]
Container Condition	Corrosion, Leaks, Swollen or Bulged, Concave Due to Vacuum Building Up and Deformation	Daily	[✓] [ ]
Container Sealing	Bungs and Covers	Daily	[✓] [ ]
Container Placement	Aisle Space, Stability Segregation by Type of Waste	Daily	[✓] [ ]
Berm and Floor	Free of Cracks and Spills	Daily	[✓] [ ]
Pallet Condition	Structural Defects	Daily	[✓] [ ]
Emergency Equipment	Functionally, Unobstructed	Daily	[✓] [ ]

b. Are inspections of the tank storage area being conducted at the required frequencies and are records of same available at proper locations as follows:

Activity/Equipment	Inspected For	Frequency	Yes	No
Tank and Associated Piping	Visually for Leaks	Daily	[✓]	[ ]
Containment Area	Visually for Leaks, Cracks, Accumulated Liquid	Daily	[✓]	[ ]
Fill and Discharge Control Equipment	Proper Function	Prior to Transfer	[✓]	[ ]
Liquid Level Gauge	For Quantity	Before Adding Waste	[✓]	[ ]
Gate Valve from Diked Area	Closed and Locked	Daily	[✓]	[ ]
Walkways	Obstructions	Daily	[✓]	[ ]
Tank Exterior and Foundation	Visually for Deterioration	Daily	[✓]	[ ]

c. Are inspections of the treatment areas being conducted at the required frequencies and are the proper records being kept at the proper locations as follows:

Activity/Equipment	Inspected For	Frequency	Yes	No
EOD Range	Possible Kickouts, Completeness of Destructions	After Every Firing	[✓]	[ ]
EOD Range	Ash and Residues Collected	After Every Firing	[✓]	[ ]

7. Water Front Area

This is a generator area and does not fall within the TSD permit. However, various wastes are unloaded from vessels, which are docked at this portion of the facility. Drums, tractor trailer tanks, and railroad tank cars may be in use at this site. This area must be inspected for possible violations.

Provide a brief description of activities noted during the inspection and provide a list of violations found below:

See Narrative section of RCRA report for two areas of concern:
① Transport of Bilge Water via Barge
② Pilot Project for treatment of oily bilge waters

Naval Weapons Station - Earle
Hwy. # 34, Colts Neck, NJ
NJO 170 022 172; Permit # 1309A1HP01
Non-commercial TSD/ Generator Inspection

INTRODUCTION:

A hazardous waste TSD/Generator Compliance Evaluation Inspection (CEI) was conducted at the above facility by this writer on March 5th and March 12, 1993. Representing the facility during this inspection was Mr. Greg Goepfert (Environmental Director), Dennis Swalwell (Environmental Protection Specialist), and Gus Hermanni (Environmental Engineer). Mr. Swalwell was presented with NJDEPE identification and was informed of the purpose and nature of the inspection to be conducted. It was also explained to Mr. Swalwell that the facility would be charged an inspection fee pursuant to NJ Hazardous Waste Regulations.

FACILITY DESCRIPTION & OPERATIONS:

The following facility description was excerpted from sections of previously written RCRA inspection reports.

Naval Weapons Station Earle is a primary East Coast Fleet Support Activity with a mission to provide ammunition logistics to Navy, Marine, and Coast Guard Units in the Northeastern United States. The operations at the facility consist of receiving, storing, and maintaining different types of ammunition, explosives, mines, and related components; renovating, fusing and defusing all types on ammunition; maintaining and operating facilities for overhaul, repair, modification, and testing of designated weapons systems components and other equipment as assigned.

The facility was built in 1943. It consists of two separate areas connected by a 16 mile "military road" - Normandy Road, and a railroad track. The main facility is approximately 850 acres on both sides of Hwy. # 34 in Colts Neck, NJ. The second area is composed of a shore base of approximately 300 acres on the Raritan Bay in Middletown.

The shore base consists of four piers which act as a docking and berthing facility for ammo and supply ships. Also present are support buildings for ship personnel.

The main facility consists of numerous buildings. The base headquarters is located here along with facilities for ammunition, storage, repair, and refurbishment. Numerous offices, vehicle repair shops, and living quarters are also located at the main facility. The majority of the hazardous waste generation and storage areas are located here as well.

The facility employs 700 civilian personnel, 600 base naval personnel, and 1000 personnel assigned to ships stationed at Earle. The base normally works one 8 hour shift per day, 5 days per week.

Hazardous wastes generated at the facility are stored in containers/drums in two on-site storage areas with a total storage capacity of 15,400 gallons and

one 3000 gallon above ground waste oil storage tank. Additionally, Earle operates an Explosive Ordinance Demolition (EOD) Range which involves the thermal destruction of explosive materials (D003 waste). This totals as 3 permitted storage areas and one permitted treatment operation under Earl's current NJ Hazardous Waste Permit.

The main facility also operates a precious metals reclamation area. Gold and silver are reclaimed from medals, buttons, dental amalgams, and silver batteries. The material is received and stored in building C-36. Ash generated from the process is sent to commercial facilities for further reclamation. Hazardous waste generated from this process is stored in building C-37. This waste consists of potassium hydroxide solution, and cadmium. Waste generated in this area is transported to one of the base's TSD storage areas.

In addition to the TSD permitted areas, the following areas are hazardous waste generation and/or accumulation points:

	AREA	BUILDING #
1.	Auto Shop	C-14
2.	Fleet Support	C-15
3.	Public Works Shop	C-16
4.	Locomotive Shop	C-50
5.	Marine Supply	C-9
6.	Precious Metals	C-37
7.	Hobby Shop	C-56
8.	Mine Assembly	MA-1
9.	Mine Assembly	MA-3
10.	Public Works Garage	R-2
11.	Ammo Rework	D-5
12.	Ammo Rework	E-14
13.	Mine Assembly	MAB-544
14.	Torpedo Shop	557
15.	Piers	1 - 4 Shore Side
16.	Bilge Cars	Shore Side

The following is a summary of the activities that result in the generation of hazardous wastes at Naval Weapons Station - Earle:

* Dry paint residue and air filters from spray paint booths
* Abrasive paint stripping materials and paint chips
* Spent solvents generated from degreasing and cleaning
* Mercuric nitrate from boiler test solution from ported ships
* Waste oil, filters, and antifreeze from facility vehicles
* Explosives
* PCB transformers, switches, rags and coveralls
* Potassium hydroxide from batteries
* Amalgam from dental centers
* Caustic solution and cadmium from the reclamation of precious metals
* Asbestos insulation from ships
* Bilge water from ships

An oil-water separator has been constructed at the shore side facility to treat oily bilge water generated from docked vessels. Mr. Goepfert stated that at present, this is only a "research type facility" and is considered a pilot operation. The facility runs intermittently on a non-routine basis. When operating, it's treatment capacity is 10 gallons per minute. Separated waste oil is disposed of via manifest as either X724 or "F" listed waste depending on the halogen content. The separated aqueous phase (water) is purified through a bank of manifolded filters and collected for analysis prior to discharge to the Middletown Municipal Utilities Authority (MUA). This discharge is done with the consent of Middletown MUA with the condition that the effluent be tested for priority pollutants analytes and total petroleum hydrocarbons on a regular basis. **See attachment # 1** for description of treatment process.

Earle plans to greatly expand this facility to accommodate 100 gallons per minute. Mr. Goepfert stated that he has discussed this with NJDEPE & Middletown MUA officials and learned that prior to the upgrade from "pilot" to fully operational status, Earle (a designated IWWMF) must obtain a Treatment Works Approval and a modification of their NJPDES permit to allow a discharge of the treated wastewater to the Raritan Bay as the Middletown MUA could not handle the increased load.

INSPECTION FINDINGS:

The facility's three (3) permitted storage areas were inspected under escort of Dennis Swalwell.

The inspection of the 3000 gallon waste oil tank located behind building C-14 was inspected with no violation noted.

The storage area located in Quonset Hut - 8 (QH8) was next inspected for permit compliance. The area was found to be clean and well organized with very little hazardous waste present (see waste inventory for specifics). No violations were apparent at this location.

The Demil Storage pad was inspected and found to be generally well maintained with the exception of inadequate aisle spacing (a violation of NJAC 7:26-9.6e). All containers were labeled with a waste description and the words "HAZARDOUS WASTE". All containers were found to be securely closed. See attached Notice of Violation and Violation Summary Sheet.

After completing the inspection of the three permitted storage areas, The EOD range was inspected. A visual survey did not reveal any apparent violations. Mr. Goeptfert stated that this area is only rarely utilized.

Several hazardous waste generator/accumulation areas were next inspected. No container management violations were noted at any of these locations. See the Waste inventory section for areas inspected and types of waste present.

See Confidential Section of this report for narrative on facility's procedure for storage and off site transport of X-724 bilge water.

Upon completion of the site inspection tour, a review of the facility's required RCRA records was conducted. Contingency planning, preparative &

prevention measures, closure planning, hazardous waste manifesting, waste analysis, and hazardous waste inspection procedures and associated logs were found to be in compliance with permit operating authorizations.

The review of the facility personnel RCRA training records revealed that Dennis Swalwell has not received annual RCRA refresher training since 12/90. This is a violation of NJAC 7:26-9.4(g). See attached Notice of Violation and Summary of Violation sheet.

Prior to my departure from the facility, an exit interview was held with facility personnel. They were informed of the inspection findings and were instructed as to the required corrective action needed. Mr. Goeptfert stated that EARLE would forward proof of compliance to this office within 30 days (to include photography of Demil pad showing adequate aisle space along with a current RCRA training certificate for Dennis Swalwell).

attachment

ATTACHMENT # 1

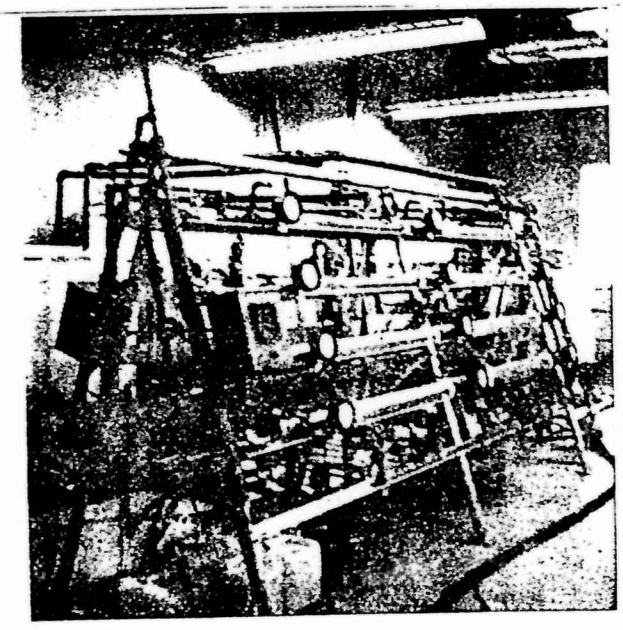
OIL / WATER SEPARATION OF BILGE

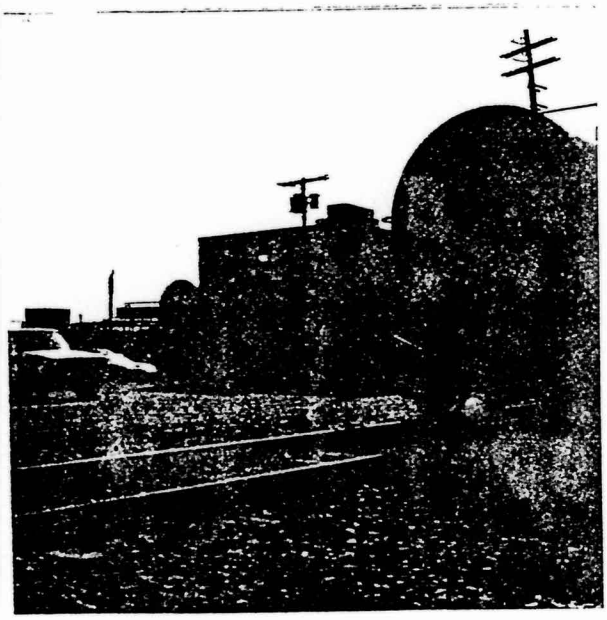
The largest volume of hazardous waste that is generated on this station is bilge water from ships berthed at NWS Earle piers. Bilge water is a hazardous waste in New Jersey due to its oil content, which is approximately a 90 to 10 water to oil ratio. The construction of an oil water separator facility at the waterfront area in mid 1991 has been a pilot project to decrease the amount of bilge water we must dispose as hazardous waste. Normal generation of bilge water from this facility exceeds 800,000 gallons per year.

The facility is being operated by the David Taylor Research Laboratory, which is a U.S. Navy shipboard research and development organization. Currently this facility is capable of processing 10 gallons per minute, by separating the oil from the bilge water.

The building which houses this separator unit is building R-30. There is rail access to both sides of this building, since bilge water is transported from the piers via rail tank cars. After the oil is separated from the water, the water can be disposed through the sewerage system, and the oil is disposed as a recyclable oil.

This facility will be turned over to NWS Earle in January 1994.





FWE-002
3/92

Let's protect our earth

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200

NOTICE OF VIOLATION

ID NO. NJ0170022172 DATE 3/12/93

NAME OF FACILITY Naval Weapons Station - Earle

LOCATION OF FACILITY Route # 34; Colts Neck, NJ

NAME OF OPERATOR Greg Goepfert; Env. Director

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION NJAC 7:26-9.6(e) Failure of owner/operator to maintain sufficient aisle space to allow for unobstructed movement of personnel or equipment in an emergency. Specifically failure to have at least 18" of aisle space for drums at Demil Pad.

NJAC 7:26-9.4(g) Failure of facility to provide classroom or on the job training for facility personnel. Specifically Dennis Swalwell failed to have annual refresher training within last 12 months.

Remedial action to correct these violations must be initiated immediately and be completed by April 5, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of $50,000 per violation.

3/12/93
Facility Receipt of Copy Only

Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

SUMMARY OF VIOLATIONS

THE FOLLOWING NOTICES OF VIOLATION WERE ISSUED UNDER NJAC 7:26 TO NAVAL WEAPONS STATION EARLE DURING THE HAZARDOUS WASTE COMPLIANCE EVALUATION INSPECTION CONDUCTED ON MARCH 5, AND 12, 1993.

9.6(e) - Failure of owner or operator to maintain adequate aisle space to allow for unobstructed movement of personnel or equipment in an emergency. Specifically, the inspection of the DEMIL Area storage pad revealed inadequate aisle spacing

9.4(q) - Failure of owner or operator to provide classroom or on the job training to those employees who handle / manage hazardous wastes. Specifically, Dennis Swalwell failed to have the required RCRA annual refresher training (last documented training was 12/90.)

HAZARDOUS WASTE INVENTORY

GENERATOR AREAS

AREA	BLDG #	WASTE
1. Auto Shop	C-14	1-55 GAL DRUM WASTE ANTIFREEZE (D008) 2-55 GAL. DRUM X721 WASTE OIL
2. Fleet Support	C-15	1-55 GAL. DRUM WASTE OIL 1-30 GAL. DRUM LEAD BATTERIES 1-55 GAL. DRUM WASTE TOLUENE 2-5 GAL. DRUMS ALUMINUM WASTE
3. Public Works Shop	C-16	NONE
4. Locomotive Shop	C-50	APPROXIMATELY 300 GALLONS X721 WASTE OIL IN ABOVE GROUND 300 GAL. TANK 8-55 GAL. DRUMS X726 WASTE OIL
5. Marine Supply	C-9	NONE
6. Precious Metals	C-37	NONE
7. Hobby Shop	C-56	APPROXIMATELY 300 GAL. X721 WASTE OIL IN ABOVE GROUND 1000 GAL TANK
8. Mine Assembly	MA-1	NONE
9. Mine Assembly	MA-3	NONE
10. Public Works Garage	R-2	NONE
11. Ammo Rework	D-5	NONE
12. Ammo Rework	E-14	NONE
13. Mine Assembly	MAB-544	NONE
14. Torpedo Shop	557	NONE
15. Piers	1 - 4 Shore Side	NONE
16. Bilge Cars	Shore Side	Several with X724 BILGE WATER

PERMITTED AREAS

QH-8	1-ONE GALLON CONTAINER MERCURY WASTE (D009) 1-ONE GALLON CONTAINER LITHIUM BATTERIES
3000 GALLON WASTE OIL TANK	< 3000 GALLONS OIL
DEMIL PAD	1 - 9 GAL. CAN WASTE STERNO 1 - 15 GAL. CAN WASTE MEK 1 - 1qt. JAR WASTE NH4 MOLYBDATE 1 - 5 GAL JAR BROKEN THERMOMETER 2 - 55 GAL DRUMS WASTE TOLUENE/XYLENE 1 - 5 GAL CAN WASTE PAINT 1 - 5 GAL CAN POTAS. HYDROXIDE 1 - 5 GAL CAN MERCURIC NITRATE

DEMIL PAD (cont)

2 - 30 GAL DRUMS PCB CONTAM. CLOTHS
16 - 55 GAL DRUMS SPILL CLEAN UP WASTE
2 - 55 GAL. DRUMS OILY RAGS
2 - 30 GAL DRUMS WASTE PAINT FILTERS
1 - 30 GAL. DRUM SANDBLAST GLASS BEADS
1 - 55 GAL DRUM ZINC CHLORDATE PAINT
1 - 5 GAL CAN LEAD BASE PAINT
1 - 5 GAL CAN WASTE VARNISH
1 - 1 GAL CAN WASTE OIL BASE PAINT
1 - 3 GAL CAN WASTE ACRYLIC COATING
1 - 5 GAL CAN WASTE X-RAY FIXER
1 - 55 GAL DRUM WASTE ENAMEL PAINT
1 - 55 GAL DRUM WASTE OIL FILTERS
1 - 55 GAL DRUM WASTE OIL PADS
1 - 55 GAL DRUM WASTE OIL CONTAM. SPEEDY DRY
1 - 1 GAL CAN WASTE TOLUENE
2 - 55 GAL DRUMS WASTE OIL
4 - 55 GAL DRUMS WASTE OIL & WATER
7 - 5 GAL CANS WASTE OIL BASE PAINT
1 - 55 GAL DRUM WASTE OIL
4 - 55 GAL DRUMS SHOT BLAST WASTE
1 - 55 GAL DRUM WASTE NICAD BATTERIES
1 - 15 GAL CAN WASTE BATTERY ACID
1 - 55 GAL DRUM WASTE OIL & WATER
1 - 55 GAL DRUM WASTE ACID BATTERIES
1 - 55 GAL DRUM WASTE OIL FILTERS

	3/5/93	3/12/93
TIME IN:	0900	0800
TIME OUT:	1530	1430

PHOTOS TAKEN (__) YES (✓) NO IF YES, HOW MANY? N/A

SAMPLE TAKEN (__) YES (✓) NO NO. OF SAMPLES N/A

NJDEP SAMPLE ID#: N/A

MANIFESTS REVIEWED (✓) YES (__) NO

Number of manifests in compliance 155

Number of manifests not in compliance 0

List manifest document numbers of those manifests not in compliance.

GENERAL CHECKLIST

		YES	NO	N/A
GENERAL				
7:26-7.4(a)1	Does the Generator have an EPA ID number?	✓		
HAZARDOUS WASTE DETERMINATION				
7:26-8.5(a)	Did the generator test its waste to determine whether it is hazardous?	✓		
7:26-8.5(b)	Did the generator determine the hazardous characteristics based upon knowledge of process?	✓		
	Is the waste hazardous?	✓		
7:26-8.5(d)	Were test results, waste analysis, or other determinations made in accordance with this section kept for three years from the date that the waste was last sent to an on-site or off-site TSF? Checked since Last inspection ~1/92	✓		
MANIFESTS				
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	✓		
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration. * NOT for MARINE BARGE ~ See Narrative.	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

GENERATOR/TSD MANIFEST INSPECTION CHECKLIST

MANIFESTS:

Outgoing:

N.J.A.C. 7:26-	Yes	No	N/A
7.4(a)4, 5 - Does each outgoing manifest have the following information?	[✓]	[ ]	[ ]
7.4(a)4i - Generator's name, address (site and mailing), and telephone number?	[✓]	[ ]	[ ]
7.4(a)4ii - Generator's EPA ID number?	[✓]	[ ]	[ ]
7.4(a)4iii - Transporter's name, telephone number, and NJDEP registration and decal numbers? See Narrative.	[✓]	[ ]	[ ]
7.4(a)4iv - Transporter's EPA ID number?	[✓]	[ ]	[ ]
7.4(a)4v - Designated facility name, address, and telephone number?	[✓]	[ ]	[ ]
7.4(a)4vi - TSF's EPA ID number?	[✓]	[ ]	[ ]
7.4(a)4vii - Proper USDOT description (proper shipping name, hazard class, ID number, quantity, waste code)?	[✓]	[ ]	[ ]
7.4(a)4vii - Complete NOS description in Section J, where applicable?	[✓]	[ ]	[ ]
7.4(h) - Exception report requirements?	[ ]	[ ]	[✓]
7.4(a)5i - Generator's signature for manifest certification?	[✓]	[ ]	[ ]
7.4(a)4viii - Generator's name and date for manifest certification?	[✓]	[ ]	[ ]
7.4(a)5ii - Transporter's signature and date acknowledging receipt?	[✓]	[ ]	[ ]
7.4(a)4viii - Printed name of transporter acknowledging receipt?	[✓]	[ ]	[ ]

Total number of outgoing manifests reviewed: 155

Incoming - United States
N.J.A.C. 7:26-7.6(a)2 * No INCOMING MANIFESTS *

Does each incoming manifest (from United States) have the following information?

Generator's name, address (site and mailing), telephone number, EPA ID number, signature and date?	[ ]	[ ]	[✓]
Transporter's name, telephone number, NJDEP registration and decal numbers, signature and date?	[ ]	[ ]	[✓]
Designated facility name, address, telephone number, and EPA ID number?	[ ]	[ ]	[✓]
Proper USDOT description of waste (proper shipping name, hazard class, ID number, quantity, waste code)?	[ ]	[ ]	[✓]
Complete NOS description in Section J, where applicable?	[ ]	[ ]	[✓]
Manifest Document Number?	[ ]	[ ]	[✓]

N.J.A.C. 7:26-7.6(b)	Yes	No	N/A
Did facility sign and date each manifest?	[ ]	[ ]	[✓]

Total number of incoming (from United States) manifests reviewed: 0

Incoming - Canada
N.J.A.C. 7:26-7.4(b) * No INCOMING MANIFESTS *

Does each incoming manifest (from Canada) have the following information?

Transporter name, telephone number, NJDEP registration and decal numbers, signature and date?	[ ]	[ ]	[✓]
Designated facility name, address, telephone number, and EPA ID number?	[ ]	[ ]	[✓]
Proper USDOT description of waste (proper shipping name, hazard class, ID number, quantity, waste code)?	[ ]	[ ]	[✓]
Complete NOS description in Section J, where applicable?	[ ]	[ ]	[✓]
Manifest Document Number?	[ ]	[ ]	[✓]

N.J.A.C. 7:26-

7.6(b) - Did facility sign and date each manifest?	[ ]	[ ]	[✓]
7.6(c)1 - Generator's name, address, U.S. importer's name, address and EPA ID number?	[ ]	[ ]	[✓]
7.6(c)2 - U.S. importer's agent signature and date?	[ ]	[ ]	[✓]

Total number of incoming (from Canada) manifests reviewed: 0

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓		
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?			✓
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	✓		
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?			✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			✓

Checked Since Last Inspection.

7:26-9.3

Accumulation Time

How is waste accumulated on site?

WASTE OIL STORAGE ONLY

(✓) Containers
(✓) Tanks (greater than 90 days)
(complete HWMF (TSD) Facility Checklist)
(✓) Tanks (less than 90 days)
(✓) Above ground
(__) Below ground
(__) Surface impoundments
(complete HWMF (TSD) Facility Checklist)
(__) Piles (complete HWMF checklist)

		YES	NO	N/A
7:26-9.3(a)1	Is waste accumulated for more than 90 days?	✓		

STOP HERE IF THE HAZARDOUS WASTE MANAGEMENT FACILITY (TSF) CHECKLIST IS FILLED OUT.

HAZARDOUS WASTE FACILITY STANDARDS

MANIFESTS

		YES	NO	N/A
7:26-7.4(a)4	Does each manifest have the following information? Please circle the elements missing and obtain a copy of the incomplete manifests. (List those manifests that are deficient on G-1).	✓		
7:26-7.4(a)4i	The generator's name, address and phone number.	✓		
7:26-7.4(a)4ii	The generator's EPA ID number.	✓		
7:26-7.4(a)4iii	The hauler(s) name, address phone number and NJ registration. *See Narrative.*	✓		
7:26-7.4(a)4iv	The hauler(s) EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vi	The TSF's EPA ID number.	✓		
7:26-7.4(a)4v	The name, address and phone number of the designated TSD facility.	✓		
7:26-7.4(a)4vii	The name, type and quantity of hazardous waste being shipped, including such particulars as may be required regarding same?	✓		
7:26-7.4(a)4viii	Special handling instructions and any other information required on the form to be shipped by generator?	✓		

		YES	NO	N/A
7:26-7.4(3)	Did the generator describe all N.O.S. wastes in Section J?	✓		
7:26-7.4(a)ix	When shipping hazardous waste to a waste reuse facility does the generator enter the waste reuse facility I.D. # in the section G of the Uniform Manifest?	✓		
7:26-7.4(a)5	Before allowing the manifested waste to leave the generator's property, did the generator:	✓		
7:26-7.4(a)5i	Sign the manifest certification by hand?	✓		
7:26-7.4(a)5ii	Obtain the handwritten signature of the initial transporter and date of acceptance on the manifest?	✓		
7:26-7.4(a)5iii	Retain one copy and forward one copy to the state of origin and one copy to the state of destination?	✓		
7:26-7.4(a)5iv	Provide the required numbers of copies for: generator, each hauler, owner/operator of the designated facility, as well as one copy returned to the generator by the facility owner/operator?	✓		
7:26-7.4(a)5v	Give the remaining copies of the manifest form to the hauler?	✓		
7.26-7.4(f)	Has the generator maintained facility records for three (3) years? (Manifest(s), exception report(s) and waste analysis)	✓		
7:26-7.4(h)1	Has the generator received signed copies of portion B (from the TSD facility) of all manifests for waste shipped off site more than 35 days ago?	✓		
7:26-7.4(h)1	If not: Did the generator contact the hauler and/or the owner or operator of the TSDF and the NJDEP at (609) 292-8341 to inform the NJDEP of the situation?			✓
7:26-7.4(h)2	Have exception reports been submitted to the Department covering any of these shipments made more than 45 days ago?			✓

		YES	NO	N/A
7:26-9.4(b)	WASTE ANALYSIS			
7:26-9.4(b)1i	Is there a detailed chemical and physical analysis of a representative sample of the waste(s) or each waste? (At a minimum, this analysis must contain all the information necessary for proper treatment, storage or disposal of the waste).	✓		
7:26-9.4(b)1iii	Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? Check only one:			
	Waste characteristics vary			
	All waste(s) are basically the same	✓		
	Company treats all waste(s) as hazardous			
	MOST WASTES ARE "ROUTINE" IN NATURE.			
7:26-9.4(b)2	Is there a written waste analysis plan at the facility?	✓		
	Does it contain:			
7:26-9.4(b)2i	Parameters for which each hazardous waste stream will be analyzed including constituents listed in NJAC 7:26-8.16 and the rational for the selection of these parameters?	✓		
7:26-9.4(b)2ii	The test methods which will be used to test for these parameters?	✓		
7:26-9.4(b)2iii	The sampling method which will be used to obtain a representative sample of the waste to be analyzed?	✓		
7:26-9.4(b)2iv	The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date?	✓		
7:26-9.4(b)2v	For off-site facilities, the waste analysis that hazardous waste generators have agreed to supply? NON-Commercial TSD			✓
7:26-9.4(b)2vii	Procedures which will be used to identify changes in waste stream characteristics?	✓		
7:26-9.4(b)3	Did the owner or operator submit the waste analysis plan to the Department?	✓		
	If yes, when was the plan submitted?			

WITH PART B APPLICATION 1988.

		YES	NO	N/A
7:26-9.4(b)4	If waste comes from an outside source, are there procedures in the waste analysis plan to insure that waste received conforms to the accompanying manifest?	—	—	✓

* TSD IS NON-COMMERCIAL

Does the plan describe:

7:26-9.4(b)4i	The procedures which will be used to determine the identity of each shipment of waste managed at the facility?	—	—	✓
7:26-9.4(b)4ii	The sampling method which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling?	—	—	✓
7:26-9.4(c)1	Did the facility accept hazardous waste which it is not authorized to handle?	—	—	✓
7:26-9.4i	Are all records and results of waste analysis performed pursuant to NJAC 7:26-9.4(b), 9.4(e) and 10.1 et seq applicable written in the operating log?	—	—	✓

		YES	NO	N/A
7:26-9.4(h)	Security			
	Does the facility have:			
7:26-9.4(h)1i	a 24 hour surveillance system which continuously monitors and controls entry onto the active portion of the facility?	✓		
7:26-9.4(h)1ii	An artificial or natural barrier, which completely surrounds the active portion of the facility; and a means to control entry, at all times, through the gates or other entrances to the active portion of the facility?	✓		
7:26-9.4(h)3	Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?	✓		
	If no, explain what measures are taken for security.			
7:26-9.4(f)	General Inspection Requirements			
7:26-9.4(f)1	Does the owner or operator inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to:			
7:26-9.4(f)1i	Discharge of hazardous waste constituents to the environment?	✓		
7:26-9.4(f)1ii	A threat to human health?	✓		
7:26-9.4(f)3	Has the owner or operator developed, and does the owner or operator follow a written schedule for inspecting monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are utilized for the prevention , detection or response to environmental or human health?	✓		
7:26-9.4(f)3i	Did the owner or operator submit the written inspection schedule to the Department?	✓		
	If yes, when was it submitted? yes; with Part B Application ON 11/88			
7:26-9.4(f)3iii	Is the written inspection schedule kept at the facility?	✓		

		YES	NO	N/A
7:26-9.4(f)3iv	Does the schedule identify the types of problems to be looked for during the inspection?	✓		
7:26-9.4(f)3v	Does the schedule include the frequency of inspection, based upon the rate of possible deterioration of the equipment and the probability of an environmental, or human health incident if the deterioration or malfunctions or any operator error goes undetected between inspections?	✓		
7:26-9.4(f)5	Is there evidence that problems reported in the inspection log have been remedied?			✓
7:26-9.4(f)6	Does the owner/operator record inspections in a log?	✓		
	Are these records kept for at least three (3) years from the date of inspection?	✓		
	Does the record include the date, and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial action?	✓		

		YES	NO	N/A
7:26-9.4(g)	Personnel training Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?	✓		
7:26-9.4(g)2	Is the program directed by a person trained in hazardous waste management procedures and does it include instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? DEPARTMENT OF NAVY	✓		
7:26-9.4(g)5 *	If yes, have facility personnel taken part in an annual review or training? Dennis Swalwell require Annual Reviews		X	
	Is there written documentation of the following:	✓		
7:26-9.4(g)6i	Job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job?	✓		
7:26-9.4(g)6ii	A written job description for each position related to hazardous waste management?	✓		
7:26-9.4(g)6iii	A written description of the type and amount of both introductory and continuing training given to personnel in jobs related to hazardous waste management?	✓		
7:26-9.4(g)6iv	Documentation of actual training or experience received by personnel?	✓		
7:26-9.4(g)7	Are training records kept on all current employees until closure of the facility and training records kept on former employees for 3 years from their last date of employment?	✓		
7:26-9.4(g)8	Are semiannual drills conducted involving all employees and appropriate local authorities to test emergency response capabilities at the facility in accordance with the contingency plan and emergency procedures development pursuant to NJAC 7:26-9.7?	✓		
	If no, did the owner or operator petition the Department for exemption?			✓

6/92 WATERFRONT DRILL. Comprehensive

12/92 MAIN BASE OIL SPILL DRILL.

		YES	NO	N/A
7:26-9.4(g)8i	From the semiannual drill requirements an exemption			✓
7:26-9.4(g)8ii	From the involvement of some or all local officials in the semiannual drill, providing the Department has received their written permission.			✓
7:26-9.6	Preparedness and prevention			
7:26-9.6(b)	Does the facility comply with preparedness and prevention requirements including maintaining:	✓		
7:26-9.6(b)1	An internal communications or alarm system?	✓		
7:26-9.6(b)2	A telephone or other device to summon emergency assistance from local authorities?	✓		
7:26-9.6(b)3	Portable fire equipment, spill control equipment, and decontamination equipment?	✓		
7:26-9.6(b)4	Water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems?	✓		
7:26-9.6(c)	Is equipment tested and maintained?	✓		
7:26-9.6(d)1	Is there immediate access to communications or alarm systems during handling of hazardous waste?	✓		
7:26-9.6(e)	Adequate aisle space to allow unobstructed movement of personnel fore protection equipment, spill control equipment and decontamination equipment?	✓		
	If no please explain.			
	In your opinion,do the types of waste on site require all of the above procedures, or are some not required?	✓		
	Explain.			
7:26-9.6(f)	Has the facility made the following arrangements, as appropriate for the type of waste handled on site?	✓		
7:26-9.6(f)1	Familiarize police, fire departments and emergency response teams with the layout of the facility and hazardous waste handled?	✓		

		YES	NO	N/A
7:26-9.6(f)2	Where more than one police and fire department might respond to an emergency, is there an agreement designating primary emergency authority to a specific police or fire department, and agreements with any others to provide support to the primary emergency authority?	✓		
7:26-9.6(f)3	Agreements with emergency response contractors, and equipment suppliers?	✓		

Best Environmental Systems - Belford.

7:26-9.6(f)4	Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions, or discharges at the facility?	✓		
7:26-9.6(f)5	Arrangements with local fire departments to inspect the facility on a regular basis with at least two (2) inspections annually?	✓		
7:26-9.6(f)6	Has the facilaity documented when local authorities (i.e., hospitals, police and fire departments) declined to enter into the arrangements noted in (f) through (s)?			✓

		YES	NO	N/A
7:26-9.7	Contingency plan and emergency procedures			
7:26-9.7(a)	Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions, hazards to human health or environment, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water?	✓		
7:26-9.7(b)	Are provisions of the plan carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?			✓
7:26-9.7(c)	Does the contingency plan describe the actions facility personnel shall take in response to fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	✓		
7:26-9.7(d)	Did the owner or operator prepare a Spill Prevention, Control, and Countermeasures (SPCC) Plan in accordance with 40 CFR 112 or 151 or a Discharge Prevention, Containment and Countermeasure (DPCC) Plan in accordance with N.J.A.C. 7:1E-4.1 et seq.?	✓		
	If yes, did the owner or operator amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this section? Separate Plan			✓
7:26-9.7(e)	Does the plan describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services?	✓		
7:26-9.7(f)	Does the plan list names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and is this list kept up-to-date? Where more than one person is listed, one shall be named as primary emergency coordinator and others shall assume responsibility as alternates.	✓		

		YES	NO	N/A
7:26-9.7(g)	Does the plan include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external, and decontamination equipment), where this equipment is required? Is the list kept up-to-date? In addition, does the plan include the location and a physical description of each item on the list, and a brief outline of its capabilities?	✓		
7:26-9.7(h)	Does the plan include an evacuation procedure for facility personnel where there is a possibility that evacuation could be necessary? Does this plan describe signal(s) to be used to begin evacuation, evacuation routes, and alternative evacuation routes (in case where the primary routes could be blocked by releases of hazardous waste or fires)?	✓		
7:26-9.7(i)	Is copy of the contingency plan and all revisions to the plan: 1. Maintained at the facility; and 2. Has the contingency plan been submitted to local authorities (police, fire departments, emergency response teams)?	✓		
7:26-9.7(k)	Is there an employee on-site or on call at all times with the responsibility for coordinating all emergency response measures?	✓		

		YES	NO	N/A
7:26-9.8	Closure plan			
7:26-9.8(c)	Does the facility have a written closure plan?	✓		
	Does the owner/operator keep a written copy of the closure plan and all revisions to the plan at the facility?	✓		
	If yes, does the plan include:			
7:26-9.8(e)1i	A description of how and when the facility will be partially closed (if applicable) and ultimately closed?	✓		
7:26-9.8(e)1ii	The maximum extent of the operation which will be open during the life of the facility?	✓		
7:26-9.8(e)2	An estimate of the maximum inventory of wastes in storage or in treatment at any given time during the life of the facility?	✓		
7:26-9.8(e)3	A description of the steps needed to decontaminate facility equipment during closure?	✓		
7:26-9.8(e)4	A schedule for final closure including the anticipated date when the wastes will no longer be received, the date when completion of final closure is anticipated, and inter vening milestone dates which will allow tracking of the progress of closure?	✓		

Submitted With Part B Application

		YES	NO	N/A
	Post Closure Plan			
7:26-9.9(g)	Does the facility have a written post-closure plan kept at the facility?	___	✓	___
	If yes, does the plan: Not Required			
7:26-9.9(i)	Identify the activities which will be carried on after closure and the frequency of these activities?	___	___	✓
7:26-9.9(i)1	Include a description of the planned ground-water monitoring activities and frequencies at which they will be performed?	___	___	✓
7:26-9.9(i)2	Include a description of the planned maintence activities, and frequency at which they will be performed, to ensure the following:	___	___	✓
7:26-9.9(i)2i	The integrity of the cap and final cover or other containment structures where applicable?	___	___	✓
7:26-9.9(i)2ii	Describe the function of the facility monitoring equipment?	___	___	✓
7:26-9.9(i)3	Include the name, address and phone number of a person or office to contact about the disposal facility during the post-closure period?	___	___	✓
	Does the owner/operator have a written estimate of the cost of post-closure for the facility?	___	___	✓
	If yes, what is it?			

Please circle all appropriate activities and answer questions in appropriate sections for all activities circled.

Storage	Treatment	Disposal
(Container)	Tank	Landfill -
(Tank, above ground)	Surface Impoundments	
Tank, below ground	Incineration	Surface Impoundments -
Surface Impoundments	Thermal Treatment	Other_____
Other_____	Chemical, Physical and Biological Treatment - pg. 25	
	Other_____	

* EOD RANGE
Exploding OF Munitions (Rarely USED)

		YES	NO	N/A
7:26-9.4(d)	Containers			
	What type of containers are used for storage? Describe the size, type, quantity and nature of wastes (e.g., 12 fifty-five gallon drums of waste acetone) 55-gal Steel & Poly Drums Various Smaller types of containers			
7:26-10.4(b)1	Is there a containment system for spills, leaks and precipitation?	✓		
	If yes, describe the containment system. Bermed 6"			
7:26-10.4(b)1i	Is the base underlying the containers free of cracks or gaps and impervious to the materials to be stored?	✓		
7:26-10.4(b)1ii	Is the containment materials compatible with the waste being stored?	✓		
7:26-10.4(b)1iii	Is the containment system designed to efficiently drain or remove liquids resulting from spills, leaks or precipitation? Are containers protected from contact with accumulated liquids?	✓		
7:26-10.4(b)1iv	Is the containment system of sufficient capacity to contain ten percent of the volume of all containers or the volume of the largest container?	✓		
7:26-10.4(b)2	Is runoff into the containment system prevented?	✓		
7:26-10.4(b)3	Is accumulated precipitation removed from the sump or collection area in a timely manner?	✓		
7:26-10.4(b)4	Is spilled or leaked waste removed from the sump or collection area daily?	✓		
7:26-9.4(d)1i	Do the containers appear to be of sturdy leak-proof construction of adequate wall thickness, weld, hinge and seam strength, and of sufficient material strength to withstand side and bottom shock, while filled, without impairment of the container's ability to contain hazardous waste?	✓		
	If no, explain.			

		YES	NO	N/A
7:26-9.4(d)1ii	Are the lids, caps, hinges or other closure devices of sufficient strength that when closed, they will withstand dropping, overturning or other shock without impairment of the container's ability to contain hazardous waste?	✓		
	If no, please explain.			
7:26-9.6(e)	Adequate aisle space (18") to allow unobstructed movement of personnel fire protection equipment, spill control equipment and decontamination equipment? @STORAGE PAD Near Demil Area.		X	
7:26-9.4(d)2	Do the containers appear to be in good condition, not in danger of leaking?	✓		
7:26-9.4(d)2	If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.			
7:26-9.4(d)3	Are hazardous wastes stored in containers made of compatible materials?	✓		
7:26-9.4(d)4i	Are all containers securely closed, except those in use, so that there is no escape of hazardous waste or its vapors?	✓		
	If no, explain.			
7:26-9.4(d)4iii	Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?			✓
	If no, explain.			
7:26-9.4(d)4iv	Are containerized hazardous wastes segregated in storage by waste type?	✓		
7:26-9.4(d)4v	Are containerized hazardous wastes arranged so that their identification label is visible?	✓		
7:26-9.4(d)5	Does the owner/operator inspect and document the contianer storage area at least daily, looking for leaks and for deterioration caused by corrosion or other factors?	✓		
7:26-9.4(d)6	Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?	✓		
7:26-9.4(d)7i	Are incompatible waste, or incompatible wastes and materials placed in the same container?		✓	
	If yes, explain.			

		YES	NO	N/A
7:26-9.4(d)7ii	Are hazardous waste placed in unwashed containers that previously held incompatible wastes?		✓	
	If yes, explain.			
7:26-9.4(d)7iii	Are containers holding hazardous waste that are incompatible with any waste or other materials stored nearby in other containers, open tanks, or surface impoundments separated from the other materials or protected from them by means of a dike, berm, wall or other device?	✓		
7:26-9.4(e)1i	Are ignitable, reactive or incompatible wastes protected from sources of ignition or reaction?	✓		
	If no, explain.			
7:26-9.4(e)1ii	Does the owner/operator confine smoking and open flames to specially designated locations when ignitable or reactive wastes are being handled?	✓		
	If no, explain.			
7:26-9.4(e)1iii	Does the owner/operator conspicuously place "No Smoking" signs whenever there is a hazard from ignitable or reactive waste?	✓		
	If the treatment, storage or disposal of ignitable or reactive waste, and the mixture of incompatible wastes and materials, conducted so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?	✓		
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?	✓		
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk or fire or explosion?	✓		
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?	✓		

		YES	NO	N/A
7:26-9.4(e)2v	Threaten human health or the environment?	✓		
7:26-10.5	Tanks			
	What are the number and approximate size of tanks containing hazardous waste? Identify the waste stored/treated in each tank. 3000 gal Above Ground Waste Oil			
7:26-10.5(b)1	Are tanks of sufficient shell strength and, for closed tanks, do they have pressure controls to assure that they do not collapse or rupture?	✓		
7:26-10.5(c)1	Are wastes stored which are incompatible with the materials used in construction of the tanks?		✓	
7:26-10.5(c)2	Are there controls to control:			
7:26-10.5(c)2i	Overfilling (ie. waste feed cutoff system).			
7:26-10.5(c)2ii	For uncovered tanks, is there at least 2 feet (60 cm) of freeboard or an amount of freeboard which is acceptable to the Department? (Documentation required)			✓
7:26-10.5(d)1	Do aboveground storage tanks have containment systems capable of collecting and holding spills, leaks and precipitation?	✓		
7:26-10.5(d)1i	Is the base underlying the tanks free of cracks or gaps and impervious to certain spills, leaks and accumulating rainfall until it is collected?	✓		
7:26-10.5(d)1ii	Is the containment system compatible with the wastes being stored?	✓		
7:26-10.5(d)1iii	Is the containment system sloped or designed to efficiently drain and remove liquids resulting from leaks,spills and precipitation? Are tanks protected from accumulated liquids?	✓		
7:26-10.5(d)1v	Is the containment system of sufficient capacity to contain ten percent of the volume of all tanks or the volume of the largest tank, whichever is greatest?	✓		
7:26-10.5(d)2	Is runon into the containment system prevented?	✓		
7:26-10.5(d)3	Is accumulated precipitation removed from the sump or collection area in a timely manner?	✓		
7:26-10.5(d)4	Is spilled or leaked waste removed from the sump or collection area daily?	✓		

As Needed.

		YES	NO	N/A
7:26-10.5(e)1i	Is overfilling control equipment inspected daily?	✓		
7:26-10.5(e)1ii	Is data from monitoring equipment reviewed to assure the tank is operating according to its design?	✓		
7:26-10.5(e)1iv	Is the level of waste in the tank checked each operating day?	✓		
7:26-10.5(e)1v	Are the construction materials of the aboveground portion of the tank checked for corrosion or leaks each operating day?	✓		
7:26-10.5(e)1vi	Is the area surrounding the tank checked each operating day for signs of leakage?	✓		
7:26-9.4f6	Are records and results of these inspections written in the operating log?	✓		
	Are ignitible or reactive wastes placed in a tank?		✓	
7:26-10.5(i)1i	If yes, was it rendered to no longer meet the criteria of ignitible or reactive wastes pursuant to NJAC 7:26-8.9 or 8.11.			
	or			
7:26-10.5(i)1ii	Is it stored or treated in such a way that it is protected from any material or conditions which may cause it to ignite or react.			
	or			
7:26-10.5(i)1iii	The tank is used solely for emergencies?			✓
7:26-10.5(j)1	Are incompatible wastes placed in the same tank?			✓
7:26-9.2(b)	Are there underground tanks used to store hazardous waste?		✓	
	If yes, how many and can they be entered for inspection?			
	What is the tank capacity and waste material is stored?			✓
	Has the underground tank been in use on or before November 19, 1980? Specify date.			✓
	If no, when was the tank placed in use?			

		YES	NO	N/A
7:26-9.2(b)3i	Does the facility have a groundwater monitoring plan approved by the Department?			✓
7:26-9.2(b)3ii	Is the use of the tank specified to the manufacturer's recommended lifetime?			✓
7:26-10.5(e)6	Are the underground tanks subjected to periodic integrity testing?			✓
7:26-10.6	Surface Impoundments			
	Describe the design and operating features of the surface impoundment to prevent groundwater contamination (e.g., liner leachate collection system). None			
	Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of waste stored and treated.			
7:26-10.6(e)2	Is there at least 2 feet of freeboard in the impoundment?			✓
7:26-10.6(c)4	Do all earthen dikes have a protective cover to preserve their structural integrity?			✓
	If yes, please specify the type of covering.			
7:26-9.4(b)1	Does the owner/operator have a detailed chemical and physical analysis of a representative sample of the waste in the impoundment?			✓
7:26-9.4(c)2	Does the owner/operator place the results from each waste analysis and trial test, or the documented information, in the operating record of the facility?			✓
7:26-10.6(f)	Does the owner or operator inspect each operating day?			✓
7:26-10.6(f)2i	The freeboard level at least once each operating day to ensure compliance with subsection 10.6(e)2?			✓
7:26-10.6(f)2iii	The surface impoundment, including dikes and vegetation surrounding the dike, at least once a week to detect any leaks, deterioration or failures in the impoundment?			✓

		YES	NO	N/A
7:26-10.6(e)5	Are ignitable or reactive waste placed in the surface impoundment?			✓
7:26-10.6(e)5i	If yes, is the waste treated, rendered, or mixed before or immediately after placement in the impoundment?			
7:26-10.6(e)5ii	Does the resulting waste, mixture, or dissolution of material no longer meet the definition of ignitable or reactive waste?			✓
7:26-10.6(e)5i2	Is the waste treated, rendered or mixed so that it does not:			
7:26-9.4(e)2i	Generate extreme heat or pressure, fire or explosion, or violent reaction?			✓
7:26-9.4(e)2ii	Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health?			✓
7:26-9.4(e)2iii	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion?			✓
7:26-9.4(e)1	Is the waste separated from sources of ignition or reaction?			✓
7:26-9.4(e)2	Are "No Smoking " signs conspicuously placed where there is a risk of ignition or reaction?			✓
7:26-9.4(e)2iv	Damage the structural integrity of the device or facility containing the waste?			✓
7:26-9.4(e)2v	Threaten human health or the environment			✓
7:2610.6(e)5iii	Is the surface impoundment used solely for emergencies?			✓
7:26-10.6(e)6	Are incompatible wastes, or incompatible wastes and materials placed in the same surface impoundment?			✓
7:26-10.7	Incinerator No			
	What type of incinerator is at the site (e.g. waterwall, incinerator, boiler, fluidized bed, etc.)?			
	List the types and quantities of hazardous waste incinerated.			

		YES	NO	N/A
	Is the residue from the incinerator a hazardous waste?	—	—	✓
	What types of air pollution control devices (if any) are installed in the incinerator unit?			
	Is energy recovered from the process?	—	—	✓
	If yes, describe.			
	What is the destruction and removal efficiency for organic hazardous waste constituents?			
	Does the waste analysis contain:			
7:26-12.9(b)1i(1)	Heating value of the waste?	—	—	✓
7:26-12.9(b)1i(2)	Description of physical form?	—	—	✓
7:26-11.5(b)1iii	Identification of hazardous organic constituents listed in NJAC 7:26-8.16 which are present in the waste?	—	—	✓
	<u>Monitoring and Inspection</u>			
7:26-10.7 (h) 1i	Are combustion temperature, waste feedback, auxiliary fuel feedback and air feedback monitored continuously?	—	—	✓
7:26-10.7(h)1ii	Is carbon monoxide and oxygen monitored continuously?	—	—	✓
7:26-10.7(h)2	Is the incinerator and associated equipment inspected at least daily for leaks, spills and fugitive emissions?	—	—	✓
7:26-10.7(h)2	Are all emergency shutdown controls and systems alarms checked to assure proper operation?	—	—	✓
7:26-10.7(h)3	Is the information requested above recorded in the operating log?	—	—	✓
7:26-10.7(b)2	Does the owner/operator conduct sufficient work analysis in the frequency and method outlined in the permit?	—	—	✓
7:26-10.7(e)1	Is the owner/operator burning only those wastes listed in the permit?	—	—	✓
	If no, explain.			
7:26-10.7(f)1	Is the incinerator being operated within permit requirements?	—	—	✓

YES NO N/A

7:26-11.6 Thermal Treatment None

What type of thermal treatment is at the site (e.g., waterwall incinerator, boiler, fluidized bed, etc.)?

List the types and quantities of hazardous waste thermally treated.

Is the residue from the thermal treatment unit a hazardous waste? ___ ___ ___✓

What types of air pollution control devices (if any) are installed in the thermal treatment unit?

		YES	NO	N/A
7:26-11.7(e)1	Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?			✓
	If yes, explain how.			
7:26-11.7(f)	Are the incompatible wastes placed in the same treatment process?			✓
	If yes, please explain.			
7:14A-6	Ground Water Monitoring			
	(Applies only to: Surface impoundments, landfills, land disposal facilities).			NONE
7:14A-6.2	Does the owner/operator have a ground water monitoring plan approved by the department and capable of determining the facility's impact on the quality of ground water?			✓
	If no, please explain.			
	How many monitoring wells has the facility installed?			
	What is the depth to ground water?			
	How many deep monitoring wells are on site? (Indicate depth of monitoring wells).			
	How many shallow monitoring wells are on site? (Indicate depth of monitoring wells).			
7:14A-6.3(a)	Is the ground water monitoring system capable of yielding ground water samples for analysis?			✓
	If no, please explain.			
7:14A-6.3(a)1	Are monitoring wells installed hydraulically upgradient?			✓
	If yes, specify how many and the depth of each.			

		YES	NO	N/A
7:14A-6.3(a)2	How many monitoring wells are installed hydraulically downgradient?	—	—	✓
	If yes, specify how many and the depth of each.			
7:14A-6.4(a)	Does the owner/operator have a ground water sampling and analysis plan?	—	—	✓
	If no, please explain.			
7:14A-6.4(a)	Does the plan include procedures and techniques for:			
	1. Sample Collection	—	—	✓
	2. Sample Preservation and Shipment	—	—	✓
	3. Analytical Procedures	—	—	✓
	4. Chain of Custody	—	—	✓
	List the types and quantities of hazardous waste incinerated.			
7:26-9.4(b)3	Did the owner or operator submit the waste analysis plan to the Department?	✓	—	—
	If yes, when was the plan submitted?			

With PART B - 1988

CONFIDENTIAL REPORT SECTION

TO: FILE 13-09-01
RE: STATUS OF NAVAL WEAPONS STATION EARL'S
HANDLING/MANAGEMENT OF BILGE WATER VIA BARGE
DATE: MARCH 18, 1993

ON 3/5 & 3/12 1993 THIS WRITER CONDUCTED THE ANNUAL ROUTINE TSD/GENERATOR INSPECTION AT THE SUBJECT FACILITY. DURING THIS INSPECTION, THE FOLLOWING INFORMATION WAS OBTAINED CONCERNING THE SUBJECT TOPIC:

1) WITH THE EXCEPTION OF SMALL AMOUNTS OF BILGE WATER WHICH IS INTERMITTENTLY PROCESSES IN THE FACILITY'S "PILOT" OIL WATER SEPARATOR PROJECT (SEE RCRA REPORT NARRATIVE), EARLE CONTINUES TO ROUTINELY ACCUMULATE X724 BILGE WATER ON A BARGE WHICH DOCKS AT THEIR PIER.

2) THE BARGE IS OWNED BY EKLOF MARINE CORP.; 1571 RICHMOND TERR.; STATEN ISLAND, NY; NYD 044 708 352. THIS BARGE IS NOT REGISTERED WITH NJDEPE FOR TRANSPORT OF HAZARDOUS WASTE.

3) ACCORDING TO MR. GREG GOEPTFERT (ENVIRONMENTAL DIRECTOR), EARLE HAD RECENTLY CONDUCTED AN INTERNAL INVESTIGATION ON EKLOF WHICH INVOLVED TRAILING THE BARGE WHEN IT LEFT EARLE. IT WAS OBSERVED FOR "HEIGHT" IN THE WATER TO INSURE THAT NO DISCHARGE OF THE X724 WAS OCCURRING PRIOR TO THE BARGE REACHING IT'S DESTINATION. THE RESULTS OF THE INVESTIGATION DID NOT REVEAL ANY UNUSUAL ACTIVITIES.

4) MR. GOEPTFERT ALSO STATED THAT AS THERE WAS SOME QUESTION CONCERNING THE PERMITTED STATUS OF EKLOF'S FACILITY OPERATIONS IN NY, THAT EARLE NO LONGER SHIPS THE WASTE TO EKLOF'S STATEN ISLAND FACILITY. IT IS NOW SHIPPED BY EKLOF TO THE FOLLOWING FACILITY: HITCHCOCK GAS ENGINE CO.; 50 CROSS STREET; BRIDGEPORT, CONNECTICUT; CTD002593887.

5) MR. GOEPTFERT STATED THAT HE HAD MADE TELEPHONE INQUIRIES TO THE NJDEPE (HE DID NOT INDICATE WITH WHOM HE SPOKE WITH) CONCERNING THE NJDEPE TRANSPORTER REGISTRATION REQUIREMENTS FOR MARINE BARGE HAULING OF HAZARDOUS WASTE. HE STATED THAT HE WAS TOLD THAT IT WAS A "GREY AREA" AND THAT IT WAS NOT CLEAR IF ANY REGULATIONS APPLIED. HE FURTHER STATED THAT HE BELIEVED THAT THE US COAST GUARD HAD AUTHORITY IN THIS AREA AND NOT THE NJDEPE.

6) ALL OUTGOING X724 BARGE SHIPMENTS ARE CONTINUING VIA MANIFEST (WITH NO TRANSPORTER DECAL NUMBER APPEARING ON MANIFEST).
